

SEALED

3:24-mj-00010

DISTRICT OF OREGON, ss:

AFFIDAVIT OF JARED ROLLINS

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, Jared Rollins, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been so employed since July 2018. I am currently assigned to the Portland Field Office of the FBI. In 2018, I successfully completed twenty-one (21) weeks of training at the FBI Academy located in Quantico, Virginia. During that time, I was taught the use and practical application of various investigative techniques that federal law enforcement officers are allowed to employ. I have received specialized training in the investigation of complex financial crimes, provided by the FBI or DOJ

2. I am familiar with the circumstances of the offenses described in this affidavit through a combination of personal knowledge of the facts, discussion with other law enforcement officials, and other investigative activities conducted and investigative materials obtained during the investigation.

3. I submit this affidavit in support of a criminal complaint and arrest warrant for Sergey Lebedenko (“Lebedenko”) and Galina Lebedenko (“Galina”) for violations of Title 18, United States Code, sections 1343 (wire fraud) and 1956 (money laundering). This affidavit does not include all facts known to me, but rather contains facts sufficient to support the issuance of an arrest warrant.

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Statement of Probable Cause

4. On or around December 14, 2023, investigating agents learned from legal representatives of an elderly crime victim (“V-1”) of excessive charges to an American Express (AmEx) in V-1’s name by Lebedenko’s chauffeur business, Astra Car Service, LLC (“Astra”). The Agents reviewed summaries and American Express (“AmEx”) statements provided by V-1’s representatives that appeared to show unwarranted charges, in both the number and amounts of transactions, over multiple years.

5. A review of documents obtained from American Express in another investigation showed the path of all credit card charges processed by American Express. A charge is initiated at a keypad or point of sale terminal, flows via a wire through a third-party processor, and is simultaneously authorized via an American Express facility in Whitsett North Carolina. The entirety of Astra’s charges are initiated in Portland, Oregon, according to V-1’s American Express statements. This indicates that Astra’s charges would have been transmitted by interstate wires to be approved and funded by American Express.

6. On January 4, 2023, FBI and IRS-CI Agents spoke with V-1. V-1 recounted that, at some point in 2006 or 2007, V-1 met Lebedenko and started using Lebedenko’s chauffeur services as a regular customer. Lebedenko and V-1’s relationship evolved over time such that Lebedenko drove V-1 most days and provided additional services, including handyman services, housesitting V-1’s Portland-area home while V-1 was away, and running errands for V-1 and V-1’s partner.

7. Lebedenko originally charged V-1 \$90 an hour via V-1’s AmEx. When the business relationship evolved to include Lebedenko’s provision of additional personal services,

V-1 discussed reducing the rate to half the original \$90 per hour. The following is an invoice that Galina emailed to V-1 in September 2013:

From: <astralimo@aol.com>
Sent: Mon 9/30/2013 4:30:42 PM (UTC-08:00)
To: [REDACTED]
Subject: Invoice 4931 from Astra Limousine and Town Car service
Attachment: Inv_4931_from_Astra_Limousine_and_Town_Car_service_2108.pdf

Dear [REDACTED]:

Your paid invoice is attached.

'QTY' is how many hours that day." PRICE" is how much per hour." AMOUNT" is total amount for that day hours. And on the bottom is ' BALANCE DUE" is zeros.

This is how this program works.

Thank you for your business - we appreciate it very much.

Sincerely,
Galina

Astra Limousine and Town Car service
503-539-5531

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Astra Limousine and Town Car service
4506 SE Anderegg Loop
Portland, OR 97236

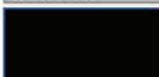
Invoice

Date 9/28/2013
Invoice # 4931

Bill To



Ship To



P.O. #

Terms weekly

Ship Date 9/28/2013

Due Date 9/28/2013

Other

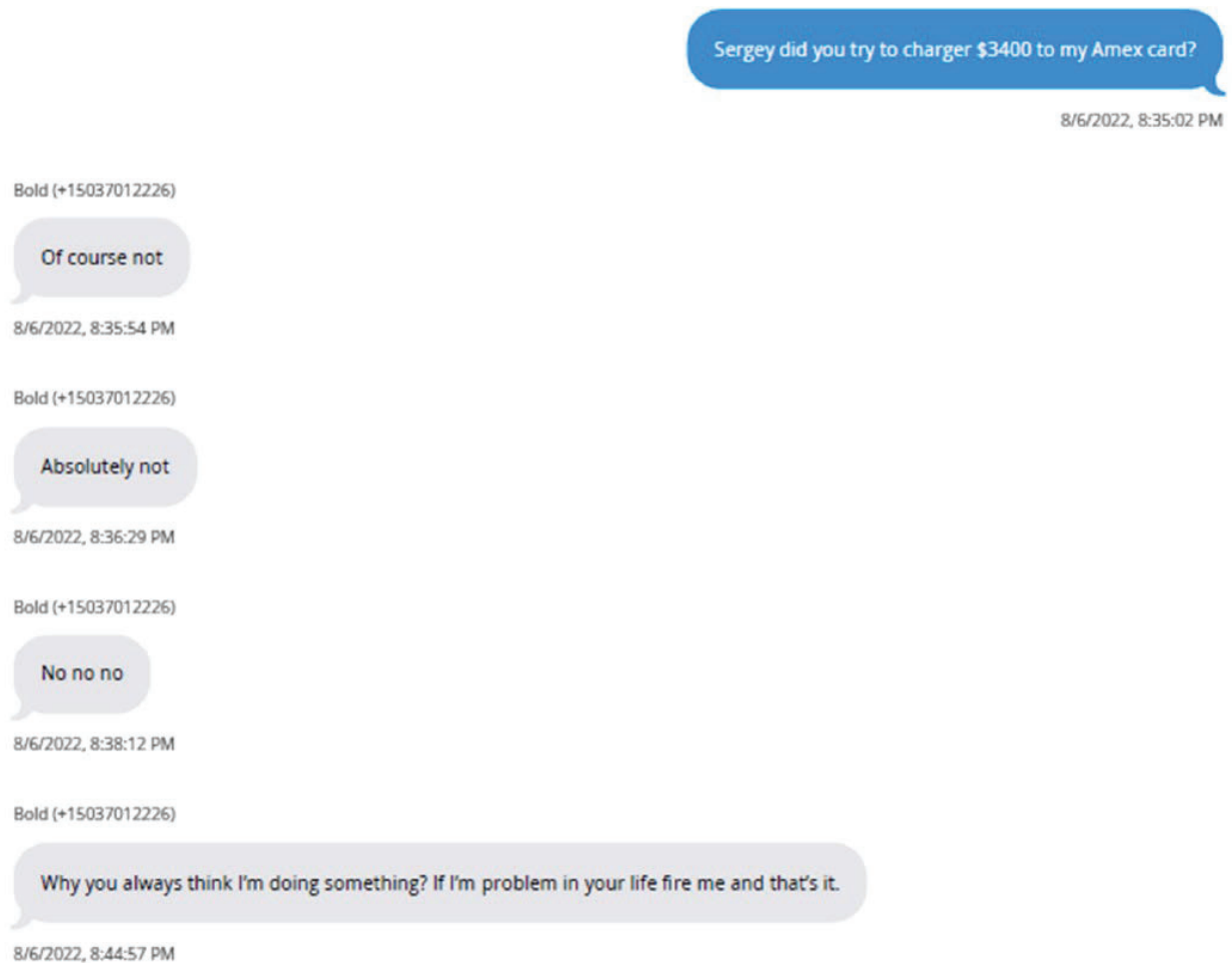
Item	Description	Qty	Price	Amount
lexus	Lexus cleaning inside, outside, trunk and after pain \$360	6	60.00	360.00
7 hours driving	7 hours driving 09-24-13 \$630	7	90.00	630.00
2 hours	Walk, drive to swim 09-24-13 \$120	2	60.00	120.00
2 hours driving	09-24-13 2 hours driving \$180	2	90.00	180.00
1 hour	09-24-13 walk, dinner, play and sitting \$60	1	60.00	60.00
7 hours drivin...	09-25-13 7 hours driving and arrands \$630	7	90.00	630.00
2 hours	09-25-13 walk, lunch, pills \$120	2	60.00	120.00
7 hours drivin...	09-26-13 driving and arrands \$630	7	90.00	630.00
3 hours	09-26-13 Morning and evening walk and play, food and pills \$180	3	60.00	180.00
6 hours drivin...	09-27-13 driving and arrands \$540	6	90.00	540.00
2 hours	09-27-13 Walk and play \$120	2	60.00	120.00
Subtotal				\$3,570.00
Sales Tax (0.0%)				\$0.00
Total				\$3,570.00
Payments/Credits				-\$3,570.00
Balance Due				\$0.00

Astra Limousine and Town Car service
astralimo@aol.com
www.astralimo.com

503-539-5531

8. Over the ensuing years, V-1 met Galina several times. Galina occasionally would help provide services to V-1. Galina was responsible for charging V-1's AmEx. When V-1 posed a question in the past about charges, Lebedenko would refer V-1 to Galina.

9. V-1 occasionally discovered Lebedenko and Galina had overcharged V-1's AmEx, the bills for which V-1 did not routinely review because they were paid by V-1's financial institution. On one such occasion, on August 6, 2022, V-1 confronted Lebedenko via iMessage. The exchange is reprinted below, with V-1's messages appearing as blue (dark) bubbles and Lebedenko's responses appearing as gray (light) bubbles:



10. Although Lebedenko denied charging V-1 \$3,400, Lebedenko and Galina had charged V-1's AmEx \$28,900 over the two-day period of August 5-6, 2022, as shown in the following table of charges:

TRANSACTION DATE	PAYEE	AMOUNT
08/05/22	ASTRA CAR SERVICE LLC 00-08002866831	500.00
08/05/22	ASTRA CAR SERVICE LLC 00-08002866831	2,900.00
08/05/22	ASTRA CAR SERVICE LLC 00-08002866831	2,800.00
08/05/22	ASTRA CAR SERVICE LLC 00-08002866831	1,100.00
08/05/22	ASTRA CAR SERVICE LLC 00-08002866831	3,100.00
08/05/22	ASTRA CAR SERVICE LLC 00-08002866831	3,500.00
08/05/22	ASTRA CAR SERVICE LLC 00-08002866831	2,800.00
08/05/22	ASTRA CAR SERVICE LLC 00-08002866831	800.00
08/05/22	ASTRA CAR SERVICE LLC 00-08002866831	900.00
08/06/22	ASTRA CAR SERVICE LLC 00-08002866831	3,100.00
08/06/22	ASTRA CAR SERVICE LLC 00-08002866831	3,300.00
08/06/22	ASTRA CAR SERVICE LLC 00-08002866831	1,200.00
08/06/22	ASTRA CAR SERVICE LLC 00-08002866831	2,500.00
08/06/22	ASTRA CAR SERVICE LLC 00-08002866831	400.00
		<u>28,900.00</u>

11. Some fifteen months later, on or about November 18, 2023, V-1 discovered that his AmEx had been charged between 10 and 15 times by Lebedenko. At the time, V-1 was outside the Portland area and did not expect that Lebedenko would be charging him for services. V-1 confronted Lebedenko about the charges and told Lebedenko to stop charging him until they could discuss the charges. V-1 threatened to fire Lebedenko. V-1 then found that additional charges were being made to his Amex after V-1 told Lebedenko to stop charging V-1's AmEx. V-1 ultimately blocked further charges by contacting American Express. After the conversation on or about November 18, 2023, V-1's AmEx was charged approximately 108 additional times for an approximate amount of \$15,703.

12. The following is the November 18, 2023, text exchange between V-1 and Lebedenko with the blue (dark) bubbles representing V-1 and the gray (light) bubbles representing Lebedenko:

Sergey American Express tells me you have charged me about approxabout \$300,00 over the course of October and November, probably more. I warned you about this and you and Galina didn't pay any attention. If this keeps up even a little bit longer you will be fired for sure.

11/18/2023, 7:38:38 PM

██████████ got your warning and sorry about that, Galina didn't charge you more then we agreed with you last year, there's probably other charges coming from, if you think I'm spending all your money then definitely fire me and you will be more comfortable with me and working for you. I'm very upset 😞 now because my daughter lost her unborn baby and on top of that you texted me about money. So you have all power to fire me but it's not only about money, it also relationship for long time with you and you know I can work for free for you because you been like my father to me. Sorry about that again and have fun at golden door little vacation! I love you Boss ❤️

11/18/2023, 8:07:58 PM

Sergey I'm going create a system requiring you to submit invoices to my accountant twice a month and he will pay you if I approve the amount. You will only be able to use the Amex card to make charges that are for me, not for yourself. We will negotiate an hourly rate for you based on standard Portland rates. If this is not Ok for you we will have to part ways. Either way, Galina will never again charge me +500 a day virtually every day of the month.

11/18/2023, 8:21:32 PM

You need to talk to Galina about all of this, she's my office worker and I'm outside working so whatever you think is best for you then do it. Remember Galina is the Boss on my side not me. And I asked you multiple times to have meeting with you about this and you refused to do it. I'm sorry again.

11/18/2023, 9:03:40 PM

13. V-1 later discovered that Astra had charged approximately \$34 million to V-1's AmEx card between 2016 and late 2023. When V-1 was asked how it made V-1 feel to discover the total amount charged by Lebedenko and Galina, V-1 said, "I was astounded . . . utterly astounded." V-1 stated V-1 would have confronted Lebedenko and Galina had V-1 known the true amount they had charged. V-1 said if V-1 had known Lebedenko and Galina had charged \$9 million in 2019, that amount alone would have astounded V-1. V-1 said V-1 would have confronted them in 2019 if v-1 had known that information at the time. V-1 said V-1 had never spent that amount of money on anything and feels taken advantage of. The loss is beyond anything V-1 could have conceived.

14. V-1 discovered that Lebedenko and Galina had acquired several properties, seemingly without encumbrances during the time they were over-charging V-1. These properties include, in approximate amounts, a \$2 million dollar residence in Bermuda Dunes, California; a \$2.3 million residence in Sunriver, Oregon; a \$1.5 million Cessna Citation III; and several other properties in the Portland, Oregon and Battleground and Vancouver, Washington, areas. Several




of these properties have been placed in nominee names either through the purchase or later title transfer.

15. Social media research shows pictures with Lebedenko and Galina celebrating the purchase of one of these properties. They may have purchased one of the properties for their pastor.

16. I reviewed V-1's American Express statements for the period thirty-day period from April 1 through April 30, 2022. Lebedenko and Galina charged V-1's Amex 225 times for a total of \$602,490 over this period, for an average of 7.5 transactions a day at an average amount of \$2,677.73. V-1 was in Portland during that period only between April 6th, 2022, and April 13th, 2022.

17. V-1 spent the rest of the month outside the Portland area and was not receiving daily services from Lebedenko and Galina. V-1's long-term partner did not spend any time in the Portland area. From April 24, 2022, to April 30, 2022, a 7-day period, Lebedenko and Galina charged V-1 180 times for a total amount of \$497,490. During this time V-1 and his partner had minimal interaction with Lebedenko.

18. A review of Oregon Secretary of State ("SOS") business records show an amendment to Astra's principal place of business on April 7, 2022. The address has been changed to 56713 Dancing Rock Loop #3204, Bend, OR 97707. The document is signed by Galina Lebedenko with the title of Member Manager. The phone number submitted for the amendment is 503-539-5531, the same number listed on the invoice from September 2013. See the below submission:

 <p>REGISTRY NUMBER: 120640990</p> <p>ENTITY TYPE: <input type="radio"/> DOMESTIC <input type="radio"/> FOREIGN</p> <p><small>In accordance with Oregon Revised Statute 192.410-192.490, the information on this application We must release this information to all parties upon request and it will be posted on our website</small></p>	<p>Corporation/Limited Liability Company - Information Change</p> <p><small>Secretary of State - Corporation Division - 255 Capitol St. NE, Suite 151 - Salem, OR 97310-3327 - sec.state@sos.oregon.gov/business - Phone: (503) 986-2200</small></p> <p>Please Type or Print Legibly in Black Ink</p> <p>FILED: APR 7, 2022 OREGON SECRETARY OF STATE</p>  <p>120640990-23269372</p> <p>ASTRA CAR SERVICE, LLC AAR</p>		
<p>1. NAME OF CORPORATION OR LIMITED LIABILITY COMPANY:</p> <hr/>			
<p>2. BUSINESS ACTIVITY Complete only the sections that you are updating.</p> <p>ASTRACAR SERVICE LLC</p> <hr/>			
<p>3. PRINCIPAL PLACE OF BUSINESS: (Street Address)</p> <p>56713 DANCING ROCK LOOP # 3204</p> <p>BEND, OR 97707</p> <hr/>	<p>6. ADDRESS WHERE THE DIVISION MAY MAIL NOTICES:</p> <hr/>		
<p>4. THE REGISTERED AGENT HAS BEEN CHANGED TO:</p> <hr/>	<p>7. THE NEW REGISTERED AGENT HAS CONSENTED TO THIS APPOINTMENT.</p> <hr/>		
<p>5. REGISTERED AGENT'S PUBLICLY AVAILABLE ADDRESS: <small>Must be an Oregon Street Address, which is identical to the registered agent's office.</small></p> <hr/>	<p>8. THE STREET ADDRESS OF THE NEW-REGISTERED OFFICE AND THE BUSINESS ADDRESS OF THE REGISTERED AGENT ARE IDENTICAL.</p> <p><small>The entity has been notified in writing of this change.</small></p> <p>9. INDIVIDUAL WITH DIRECT KNOWLEDGE (Names and Addresses) <small>List the name and address of at least one individual who is a director, or controlling shareholder of the corporation (member or manager of the LLC) or an authorized representative with direct knowledge of the operations and business activities of the corporation or LLC.</small></p> <hr/>		
<p>10. NAME(S) AND ADDRESS(ES) OF CORPORATE OFFICERS OR LLC MEMBERS/MANAGERS <small>Corporations list the name and address of one President and one Secretary (ORS 60.787, ORS 65.787, ORS 62.455, ORS 554.315). Limited Liability Companies list the name and addresses of the managers for a manager-managed limited liability company or the name and address of at least one member for a member-managed limited liability company (ORS 63.787). Please attach a separate sheet of paper if needed. If making changes to this section, list all current names and addresses. This replaces what is currently on the record.</small></p> <table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>PRESIDENT OR OWNER(S) (MEMBERS): (Names and Addresses)</p> <hr/> <hr/> <hr/> </td> <td style="width: 50%; vertical-align: top;"> <p>SECRETARY OR MANAGER(S): (Names and Addresses)</p> <hr/> <hr/> <hr/> </td> </tr> </table>		<p>PRESIDENT OR OWNER(S) (MEMBERS): (Names and Addresses)</p> <hr/> <hr/> <hr/>	<p>SECRETARY OR MANAGER(S): (Names and Addresses)</p> <hr/> <hr/> <hr/>
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<p>11. EXECUTION: I declare as an authorized signer, under penalty of perjury, that this document does not fraudulently conceal, obscure, alter, or otherwise misrepresent the identity of any person including officers, directors, employees, members, managers or agents. This filing has been examined by me and is, to the best of my knowledge and belief, true, correct and complete. Making false statements in this document is against the law and may be penalized by fines, imprisonment, or both.</p>			
<p>SIGNATURE:</p> 	<p>PRINTED NAME: GALINA LEBEDENKO</p> <p>TITLE: MEMBER MANAGER</p>		
<p>CONTACT NAME: (To resolve questions with this filing)</p> <p>GALINA LEBEDENKO</p> <p>PHONE NUMBER: (Include area code)</p> <p>503-539-5531</p> <p><small>Information Change 12/17</small></p>	<table border="1" style="width: 100%;"> <tr> <td> <p>FEES</p> <p>No Processing Fee</p> <p><small>Free copies are available at sos.oregon.gov/business using the Business Name Search program.</small></p> </td> </tr> </table>	<p>FEES</p> <p>No Processing Fee</p> <p><small>Free copies are available at sos.oregon.gov/business using the Business Name Search program.</small></p>	
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19. The Oregon SOS records show the original Articles of Organization for Astra Car Service, LLC, dated April 12, 2016. The address listed thereon is 4506 SE Andereg Loop, Portland, OR 97236. The Registered Agent at that date was Sergey Lebedenko and the Authorized Agent bore the electronic signature of Galina Lebedenko.

Request for Sealing

20. It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested criminal complaint and arrest warrant. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any disclosure of the information at this time may cause flight from prosecution, destruction of or tampering with evidence, intimidation of potential witnesses, or otherwise seriously jeopardize an investigation. Premature disclosure of the affidavit, the criminal complaint, and the arrest warrant may adversely affect the integrity of the investigation.

Conclusion

Based on the aforementioned facts, your affiant respectfully submits that there is probable cause to believe that Sergey Lebedenko and Galina Lebedenko violated Title 18, United States Code, sections 1343 (wire fraud) and 1956 (money laundering).

By phone pursuant to Fed. R. Crim. P. 4.1
JARED ROLLINS
FBI Special Agent

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at 4:08 p.m. on January 22, 2024.



HONORABLE STACIE F. BECKERMAN
United States Magistrate Judge